

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

IN RE: AQUEOUS FILM-FORMING FOAMS
PRODUCTS LIABILITY LITIGATION

Master Docket No.: 2:18-mn-2873-RMG

This document relates to:
See Exhibit A Attached Hereto

**STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs in the actions identified in Exhibit A attached hereto and Defendants Tyco Fire Products LP (“Tyco”), Chemguard, Inc. (“Chemguard”), and ChemDesign Products, Inc. (“ChemDesign”) hereby stipulate and agree to a dismissal with prejudice of all Plaintiffs’ Claims against Tyco, Chemguard, ChemDesign, and any other Released Parties¹ in the actions identified in Exhibit A pursuant to Plaintiffs’ decision to participate in the Settlement Agreement Between Public Water Systems and Tyco dated April 12, 2024 (the “Settlement Agreement”), which received final approval on November 22, 2024, from the Court overseeing *In Re: Aqueous Film-Forming Foams Products Liability Litigation*, MDL No. 2:18-mn-2873 (D.S.C.).

Each party shall bear its own costs.

¹ Unless otherwise indicated, all capitalized terms in this motion have the meaning given to them in the Settlement Agreement.

Dated: May 16, 2025

/s/ Scott Summy

Scott Summy
Cary McDougal
Carla Burke Pickrel
Jason Julius
BARON & BUDD, P.C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, TX 75219-4281
Telephone: (214) 521-3605
Fax: (214) 523-6600
ssummy@baronbudd.com
cmcdougal@baronbudd.com
cburkepickrel@baronbudd.com
jjulius@baronbudd.com

Counsel for Plaintiffs Listed on Exhibit A

/s/ Brandon Taylor

Brandon Taylor
Jody Fortunato
COSSICH SUMICH PARSIOLA
AND TAYLOR LLC
8397 Highway 23
Suite 100
Belle Chasse, LA 70037
(504) 394-9000
btaylor@coassiclaw.com
jfortunato@coassiclaw.com

Counsel for Plaintiffs Listed on Exhibit A

Respectfully submitted,

/s/ David E. Dukes

David E. Dukes
Nelson Mullins Riley & Scarborough LLP
1320 Main Street / 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, SC 29201
(803) 799-2000
david.dukes@nelsonmullins.com

/s/ Liam J. Montgomery

Liam J. Montgomery
WILLIAMS & CONNOLLY LLP
680 Maine Ave SW
Washington, DC 20024
(202) 434-5000
lmontgomery@wc.com

*Counsel for Defendants Tyco Fire Products LP
and Chemguard, Inc.*

/s/ Jonathan B. Blakley

Jonathan B. Blakley
GORDON REES SCULLY MANSUKHANI
One North Wacker, Suite 1600
Chicago, IL 60606
(312) 619-4915
jblakley@grsm.com

Counsel for ChemDesign Products Inc.